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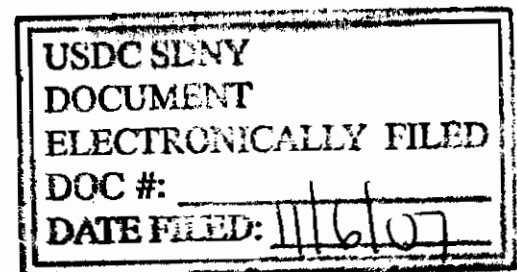
THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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November 2, 2007

**BY HAND**

Hon. Robert W. Sweet  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1920  
New York, New York 10007



Re: Ieasha S. and Maria F. v. City of New York and NYC DHS, 07 Civ. 8843

Dear Judge Sweet,


I write to respectfully request an extension of time to answer or move with respect to the complaint in the above-referenced matter from November 5, 2007 until December 5, 2007. This is the first such request defendants have made. I have spoken with Plaintiffs' counsel, Amanda Moretti of the Legal Aid Society, who refused to consent to this request. Plaintiffs' counsel only would consent to a significantly shorter extension, and conditioned that consent on terms that defendants find unacceptable.

As Your Honor may recall, this action raises significant issues with respect to the pre-transfer rights of disabled individuals from shelters operated by the Department of Homeless Services and concerning plaintiffs' individual circumstances. An extension of time to respond to the complaint should give this office sufficient time to fully investigate plaintiffs' allegations, research the applicable law and craft an appropriate response. Further, as plaintiffs have already been transferred to the Aladdin Hotel pursuant to a Stipulation of Settlement "so-ordered" by Your Honor on October 30, 2007, plaintiffs will not be prejudiced by the proposed extension. Accordingly, defendants respectfully ask for an extension of time to December 5, 2007, to respond to the complaint.

*Sgt. David  
Grove TUSDS  
11-5-07*

Thank you for your consideration of this request.

Sincerely,

  
Andrew J. Rauchberg  
Assistant Corporation Counsel

cc: Amanda Moretti, Esq.  
The Legal Aid Society  
Homeless Rights Project  
199 Water Street, 3<sup>rd</sup> Floor  
New York, New York 10038  
(via fax)